

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

Bky No. 09-50779

Dennis E. Hecker,

Chapter 7

Debtor.

Randall L. Seaver, Trustee

Plaintiff,

Adv. No. 09-5045

vs.

Dennis E. Hecker, et al.,

Defendants.

STATEMENT OF ISSUES ON APPEAL

Did the Bankruptcy Court err in determining that Midwest Motors was justified in terminating the Personal Services Agreement (“PSA”) where the negative media publicity surrounding Hecker predated the execution of the PSA, was unrelated to Midwest Motors, and was the result of actions of the media, over whom Hecker had no control?

Did the Bankruptcy improperly grant summary judgment to appellees by resolving genuine issues of material fact in favor of appellees?

Did the Bankruptcy Court err by approving the Settlement Agreement over the objection of Appellant?

NEVE LAW, PLLC

/e/ John R. Neve

John R. Neve (#278300)

8500 Normandale Lake Boulevard, Suite 1080

Minneapolis, MN 55437

(952) 929-3232

Dated: August 17, 2010

ATTORNEY FOR APPELLANT

DEFENDANT DENNIS E. HECKER

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re: Dennis E. Hecker,

Bky No. 09-50779

Debtor. Chapter 7

Randall L. Seaver, Trustee,

Adv. No. 09-5045

Plaintiff,

vs.

Dennis E. Hecker, Midwest Motors, LLC,
LKMCD Properties, LLC, Chrysler Financial Services
Americas LLC, Toyota Motor Credit Corporation,
Inver Grove Motors LLC d/b/a Denny Hecker's
Inver Grove Toyota, Jacob Holdings of Highway 110 LLC,
and Jacob Holdings of Akrom Avenue LLC,

Defendants.

UNSWORN DECLARATION FOR PROOF OF SERVICE

John R. Neve, Neve Law, PLLC, attorney licensed to practice law in this court, with office address of 8500 Normandale Lake Blvd, Suite 1080, Minneapolis, MN 55437, declares that on the date set forth below, he caused the following documents:

Statement of Issues on Appeal

to be filed electronically with the Clerk of Court through ECF, and that ECF will send an e-notice of the electronic filing to the following:

- | | |
|------------------------|---|
| • Matthew R. Burton | mburton@losgs.com, swood@losgs.com |
| • Stephen F Grinnell | stephen.grinnell@gpmlaw.com |
| • Andrew Paul Moratzka | apm@mcmlaw.com, jef@mcmlaw.com,
ldj@mcmlaw.com |
| • Timothy J Peters | tpeters@peterslawplc.com,
peters.timothy.james@gmail.com |
| • Will R. Tansey | wrtansey@ravichmeyer.com |

I further certify that I caused a copy of the foregoing documents and the notice of electronic filing to be mailed by first class mail, postage paid, to the following non-ECF participants:

Toyota Financial Savings Bank 912 Ft. Duquesne Blvd, Ste T Pittsburgh, PA 15222	Inver Grove Motors, LLC D/B/A Denny Hecker's Inver Grove Toyota 500 Ford Road Minneapolis, MN 55426
Jacob Holdings Of Akron Ave LLC 500 Ford Road Minneapolis, MN 55426	Jacob Holdings Of Hwy 110 LLC 500 Ford Road Minneapolis, MN 55426
Midwest Motors, LLC 2873 Highway 61 North Maplewood, MN 55109	Randall L. Seaver – Trustee 12400 Portland Ave S, Ste 132 Burnsville, MN 55337

And I declare, under penalty of perjury, that the foregoing is true and correct.

Dated: August 17, 2010

Signed: /e/ John R. Neve